

RESPONSE TO COMPLAINT
Dorval v. Sapphire Village Condominium Association, et al

UNITED STATES DISTRICT COURT OF THE VIRGIN ISLANDS
FOR THE DISTRICT OF ST. THOMAS AND ST. JOHN

Wilnick Doval	:	
Plaintiff	:	
v.	:	Civil No. 2018-29
Sapphire Village Condominium Owners	:	ACTION FOR DAMAGES
Association; Sidney Jarvis; Michael Baird;	:	<u>JURY TRIAL DEMANDED</u>
Nicholas Overmeyer; Richard O'Dell;	:	
Todd Farrand; Michele Lange;	:	
Mark Marolf; Matthew Swope;	:	
Clarence Levesque; Joanne Levesque;	:	
Bernard Vansluytman; Lourdes Cordero;	:	
Thomas Cordero; Madlon Jenkins-Rudziak;	:	
Nora Ibrahim; Moussa Mustafa;	:	
Sarah White; Ellen Hansen;	:	
James Koulouris; Claudia A. Woldow	:	
Defendants	:	

Rec'd JUDGE ST 06 13 18 PM 12:50

COMES NOW, Defendant, Claudia A. Woldow, *Pro se*, answers and alleges as follows:

I. NATURE OF THE ACTION

1.1 Defendant Woldow denies the assertions of Plaintiff as to the causes of action and entitlement to damages sought and leaves Plaintiff to his proof. Defendant Woldow does not know

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or socialize with Plaintiff or any other defendants named in this action at Sapphire Village or elsewhere;

1.2 Defendant Woldow had no knowledge of Dorval v. Sapphire Village Condominium Association, et al, Civ. No. 2016-50 until February 16, 2018. Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.5.36 and, therefore, denies the same;

II. PARTIES

2.1 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 2.1 and, therefore, denies the same;

2.2 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 2.2 and, therefore, denies the same;

2.3 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 2.3 and, therefore, denies the same;

2.4 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 2.4 and, therefore, denies the same;

2.5 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 2.5 and, therefore, denies the same;

2.6 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 2.6 and, therefore, denies the same;

2.7 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 2.7 and, therefore, denies the same;

2.8 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 2.8 and, therefore, denies the same;

2.9 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 2.9 and, therefore, denies the same;

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2.10 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 2.10 and, therefore, denies the same;

2.11 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 2.11 and, therefore, denies the same;

2.12 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 2.12 and, therefore, denies the same;

2.13 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 2.13 and, therefore, denies the same;

2.14 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 2.14 and, therefore, denies the same;

2.15 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 2.15 and, therefore, denies the same;

2.16 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 2.16 and, therefore, denies the same;

2.17 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 2.17 and, therefore, denies the same;

2.18 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 2.18 and, therefore, denies the same;

2.19 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 2.19 and, therefore, denies the same;

2.20 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 2.20 and, therefore, denies the same;

2.21 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 2.21 and, therefore, denies the same;

2.22 Admitted in part; denied in part;

III. JURISDICTION AND VENUE

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3.1 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 3.1 and, therefore, denies the same;

3.2 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 3.2 and, therefore, denies the same;

3.3 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 3.3 and, therefore, denies the same;

IV. FACTUAL ALLEGATIONS

4.1 The Association, Owners and Tenants Conspired, etc.

4.1.1 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.1.1 and, therefore, denies the same;

4.1.2 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.1.2 and, therefore, denies the same;

4.1.3 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.1.3 and, therefore, denies the same;

4.1.4 Admitted in part; denied in part;

4.1.5 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.1.5 and, therefore, denies the same;

4.1.6 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.1.6 and, therefore, denies the same;

4.1.7 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.1.7 and, therefore, denies the same;

4.1.8 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.1.8 and, therefore, denies the same;

4.1.9 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.1.9 and, therefore, denies the same;

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4.1.10 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.1.10 and, therefore, denies the same;

4.1.11 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.1.11 and, therefore, denies the same;

4.1.12 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.1.12 and, therefore, denies the same;

4.1.13 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.1.13 and, therefore, denies the same;

4.1.14 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.1.14 and, therefore, denies the same;

4.1.15 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.1.15 and, therefore, denies the same;

4.1.16 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.1.16 and, therefore, denies the same;

4.1.17 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.1.17 and, therefore, denies the same;

4.1.18 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.1.18 and, therefore, denies the same;

4.1.19 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.1.19 and, therefore, denies the same;

4.1.20 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.1.20 and, therefore, denies the same;

4.1.21 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.1.21 and, therefore, denies the same;

4.1.22 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.1.22 and, therefore, denies the same;

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4.1.23 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.1.23 and, therefore, denies the same;

4.1.42 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.1.42 and, therefore, denies the same;

4.2 The Association, Owners, and Tenants Compired to, etc.

4.2.1 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.2.1 and, therefore, denies the same;

4.2.2 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.2.2 and, therefore, denies the same;

4.2.3 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.2.3 and, therefore, denies the same;

4.2.4 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.2.4 and, therefore, denies the same;

4.2.5 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.2.5 and, therefore, denies the same;

4.2.6 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.2.6 and, therefore, denies the same;

4.2.7 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.2.7 and, therefore, denies the same;

4.2.8 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.2.8 and, therefore, denies the same;

4.2.9 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.2.9 and, therefore, denies the same;

4.2.10 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.2.10 and, therefore, denies the same;

4.3 Excessive Noises Emanating from Defendant Cordero s' Apt. 257

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4.3.1 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.3.1 and, therefore, denies the same;

Short-term tenants

4.3.2 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.3.2 and, therefore, denies the same;

4.3.3 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.3.3 and, therefore, denies the same;

4.3.4 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.3.4 and, therefore, denies the same;

4.3.5 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.3.5 and, therefore, denies the same;

4.3.6 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.3.6 and, therefore, denies the same;

4.3.7 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.3.7 and, therefore, denies the same;

4.3.8 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.3.8 and, therefore, denies the same;

4.3.9 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.3.9 and, therefore, denies the same;

4.3.10 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.3.10 and, therefore, denies the same;

4.3.11 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.3.11 and, therefore, denies the same;

4.3.12 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.3.12 and, therefore, denies the same;

Defendant Ellen Hansen Short-Term Tenant

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4.3.13 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.3.13 and, therefore, denies the same;

4.3.14 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.3.14 and, therefore, denies the same;

4.3.15 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.3.15 and, therefore, denies the same;

4.3.16 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.3.16 and, therefore, denies the same;

4.3.17 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.3.17 and, therefore, denies the same;

4.3.18 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.3.18 and, therefore, denies the same;

4.3.19 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.3.19 and, therefore, denies the same;

4.3.20 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.3.20 and, therefore, denies the same;

4.3.21 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.3.21 and, therefore, denies the same;

Defendant Sarah Whyte, Cleaning Services

4.3.22 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.3.22 and, therefore, denies the same;

4.3.23 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.3.23 and, therefore, denies the same;

4.3.24 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.3.24 and, therefore, denies the same;

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4.3.25 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.3.25 and, therefore, denies the same;

4.3.26 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.3.26 and, therefore, denies the same;

4.3.27 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.3.27 and, therefore, denies the same;

4.3.28 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.3.28 and, therefore, denies the same;

4.3.29 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.3.29 and, therefore, denies the same;

4.3.30 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.3.30 and, therefore, denies the same;

4.3.31 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.3.31 and, therefore, denies the same;

4.3.32 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.3.32 and, therefore, denies the same;

4.3.33 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.3.33 and, therefore, denies the same;

4.3.34 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.3.34 and, therefore, denies the same;

4.3.35 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.3.35 and, therefore, denies the same;

4.4 Excessive Noises Emanating from Defendant Joanne Levesque's Apartment 273

4.4.1 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.4.1 and, therefore, denies the same;

Defendant Matthew Swope

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4.4.2 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.4.2 and, therefore, denies the same;

4.4.3 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.4.3 and, therefore, denies the same;

4.4.4 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.4.4 and, therefore, denies the same;

4.4.5 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.4.5 and, therefore, denies the same;

4.4.6 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.4.6 and, therefore, denies the same;

4.4.7 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.4.7 and, therefore, denies the same;

4.4.8 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.4.8 and, therefore, denies the same;

4.4.9 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.4.9 and, therefore, denies the same;

4.4.10 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.4.10 and, therefore, denies the same;

4.4.11 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.4.11 and, therefore, denies the same;

4.4.12 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.4.12 and, therefore, denies the same;

4.4.13 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.4.13 and, therefore, denies the same;

4.4.14 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.4.14 and, therefore, denies the same;

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4.4.15 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.4.15 and, therefore, denies the same;

Defendants Moussa Mustafa and Nora Ibrahim

4.4.16 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.4.16 and, therefore, denies the same;

4.4.17 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.4.17 and, therefore, denies the same;

4.4.18 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.4.18 and, therefore, denies the same;

4.4.19 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.4.19 and, therefore, denies the same;

4.4.20 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.4.20 and, therefore, denies the same;

4.4.21 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.4.21 and, therefore, denies the same;

4.4.22 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.4.22 and, therefore, denies the same;

4.4.23 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.4.23 and, therefore, denies the same;

4.4.24 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.4.24 and, therefore, denies the same;

4.4.25 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.4.25 and, therefore, denies the same;

4.4.26 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.4.26 and, therefore, denies the same;

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4.4.27 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.4.27 and, therefore, denies the same;

4.4.28 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.4.28 and, therefore, denies the same;

Tenant-Apt 273

4.4.29 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.4.29 and, therefore, denies the same;

4.4.30 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.4.30 and, therefore, denies the same;

4.4.31 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.4.31 and, therefore, denies the same;

4.4.32 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.4.32 and, therefore, denies the same;

4.4.33 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.4.33 and, therefore, denies the same;

4.4.34 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.4.34 and, therefore, denies the same;

4.4.35 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.4.35 and, therefore, denies the same;

4.4.36 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.4.36 and, therefore, denies the same;

4.4.37 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.4.37 and, therefore, denies the same;

4.4.38 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.4.38 and, therefore, denies the same;

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4.4.39 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.4.39 and, therefore, denies the same;

4.4.40 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.4.40 and, therefore, denies the same;

4.4.41 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.4.41 and, therefore, denies the same;

4.4.42 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.4.42 and, therefore, denies the same;

4.4.43 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.4.43 and, therefore, denies the same;

4.4.44 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.4.44 and, therefore, denies the same;

4.5 Excessive Noises Emanating from Defendant Bernard VanSluytman's

Apartment 266

4.5.1 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.5.1 and, therefore, denies the same;

4.5.2 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.5.2 and, therefore, denies the same;

4.5.3 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.5.3 and, therefore, denies the same;

4.5.4 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.5.4 and, therefore, denies the same;

4.5.5 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.5.5 and, therefore, denies the same;

4.5.6 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.5.6 and, therefore, denies the same;

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4.5.7 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.5.7 and, therefore, denies the same;

4.5.8 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.5.8 and, therefore, denies the same;

4.5.9 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.5.9 and, therefore, denies the same;

4.5.10 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.5.10 and, therefore, denies the same;

4.5.11 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.5.11 and, therefore, denies the same;

4.5.12 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.5.12 and, therefore, denies the same;

4.5.13 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.5.13 and, therefore, denies the same;

4.5.14 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.5.14 and, therefore, denies the same;

4.5.15 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.5.15 and, therefore, denies the same;

4.5.16 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.5.16 and, therefore, denies the same;

4.5.17 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.5.17 and, therefore, denies the same;

4.5.18 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.5.18 and, therefore, denies the same;

4.5.19 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.5.19 and, therefore, denies the same;

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4.5.20 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.5.20 and, therefore, denies the same;

4.5.21 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.5.21 and, therefore, denies the same;

4.5.22 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.5.22 and, therefore, denies the same;

4.5.23 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.5.23 and, therefore, denies the same;

4.5.24 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.5.24 and, therefore, denies the same;

4.5.25 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.5.25 and, therefore, denies the same;

4.5.26 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.5.26 and, therefore, denies the same;

Defendant Claudia Woldow

4.5.28 Denied;

4.5.29 Denied;

4.5.30 Denied;

4.5.31 Denied;

4.5.32 Denied;

4.5.33 Denied;

4.5.34 Denied;

4.5.35 Denied;

4.5.36 Denied;

4.5.37 Denied;

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4.5.38 Denied;

4.6 Excessive Noises Emanating from Madlon Jenkins-Rudziak,s Apartment 274

4.6.1 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.6.1 and, therefore, denies the same;

4.6.2 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.6.2 and, therefore, denies the same;

4.6.3 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.6.3 and, therefore, denies the same;

4.6.4 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.6.4 and, therefore, denies the same;

4.6.5 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.6.5 and, therefore, denies the same;

4.6.6 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.6.6 and, therefore, denies the same;

4.6.7 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.6.7 and, therefore, denies the same;

4.6.8 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.6.8 and, therefore, denies the same;

4.6.9 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.6.9 and, therefore, denies the same;

4.6.10 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.6.10 and, therefore, denies the same;

4.6.11 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.6.11 and, therefore, denies the same;

4.6.12 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.6.12 and, therefore, denies the same;

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4.6.13 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.6.13 and, therefore, denies the same;

4.6.14 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.6.14 and, therefore, denies the same;

4.6.15 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.6.15 and, therefore, denies the same;

4.7 Sapphire Village Condominium Owners Association

Excessive Construction Noise

4.7.1 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.7.1 and, therefore, denies the same;

4.7.2 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.7.2 and, therefore, denies the same;

4.7.3 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.7.3 and, therefore, denies the same;

4.7.4 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.7.4 and, therefore, denies the same;

4.7.5 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.7.5 and, therefore, denies the same;

4.7.6 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.7.6 and, therefore, denies the same;

4.7.7 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.7.7 and, therefore, denies the same;

4.7.8 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.7.8 and, therefore, denies the same;

4.7.9 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.7.9 and, therefore, denies the same;

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4.7.10 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.7.10 and, therefore, denies the same;

4.7.11 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.7.11 and, therefore, denies the same;

4.7.12 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.7.12 and, therefore, denies the same;

4.8 Sapphire's Maintenance Employees Excessive Noise Disturbances

4.8.1 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.8.1 and, therefore, denies the same;

4.8.2 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.8.2 and, therefore, denies the same;

4.8.3 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.8.3 and, therefore, denies the same;

4.8.4 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.8.4 and, therefore, denies the same;

4.8.5 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.8.5 and, therefore, denies the same;

4.8.6 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.8.6 and, therefore, denies the same;

4.8.7 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.8.7 and, therefore, denies the same;

4.8.8 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.8.8 and, therefore, denies the same;

4.8.9 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.8.9 and, therefore, denies the same;

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4.8.10 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.8.10 and, therefore, denies the same;

4.8.11 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.8.11 and, therefore, denies the same;

4.8.12 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.8.12 and, therefore, denies the same;

4.8.13 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.8.13 and, therefore, denies the same;

4.9 Jacqueline Lindberg Racial Harassment and Intimidation

4.9.1 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.9.1 and, therefore, denies the same;

4.9.2 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.9.2 and, therefore, denies the same;

4.9.3 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.9.3 and, therefore, denies the same;

4.9.4 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.9.4 and, therefore, denies the same;

4.9.5 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.9.5 and, therefore, denies the same;

4.9.6 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.9.6 and, therefore, denies the same;

4.9.7 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.9.7 and, therefore, denies the same;

4.9.8 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.9.8 and, therefore, denies the same;

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4.9.9 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.9.9 and, therefore, denies the same;

4.10 Owners, Tenants and a Group of Individuals Harassment

4.10.1 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.10.1 and, therefore, denies the same;

4.10.2 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.10.2 and, therefore, denies the same;

4.10.3 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.10.3 and, therefore, denies the same;

4.10.4 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.10.4 and, therefore, denies the same;

4.10.5 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.10.5 and, therefore, denies the same;

4.10.6 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.10.6 and, therefore, denies the same;

4.10.7 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.10.7 and, therefore, denies the same;

4.11 Sapphire Village Condominium Owners Associate Disparate

Treatment of Me

4.11.1 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.11.1 and, therefore, denies the same;

4.11.2 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.11.2 and, therefore, denies the same;

4.11.3 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.11.3 and, therefore, denies the same;

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4.11.4 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.11.4 and, therefore, denies the same;

4.11.5 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.11.5 and, therefore, denies the same;

4.11.6 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.11.6 and, therefore, denies the same;

4.11.7 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.11.7 and, therefore, denies the same;

4.11.8 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.11.8 and, therefore, denies the same;

4.11.9 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.11.9 and, therefore, denies the same;

4.11.10 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.11.10 and, therefore, denies the same;

4.11.11 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.11.11 and, therefore, denies the same;

4.11.12 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.11.12 and, therefore, denies the same;

4.11.13 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.11.13 and, therefore, denies the same;

4.11.14 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.11.14 and, therefore, denies the same;

4.12 Unlawful Search and Seizure and Invasion of Privacy

4.12.1 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.12.1 and, therefore, denies the same;

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4.12.2 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.12.2 and, therefore, denies the same;

4.12.3 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.12.3 and, therefore, denies the same;

4.12.4 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.12.4 and, therefore, denies the same;

4.12.5 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.12.5 and, therefore, denies the same;

4.12.6 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.12.6 and, therefore, denies the same;

4.12.7 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 4.12.7 and, therefore, denies the same;

V. CLAIMS

COUNT 1: VIOLATION OF FAIR HOUSING ACT § 3601, et seq

(Against All Defendants)

5.1.1 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.1.1 and, therefore, denies the same;

5.1.2 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.1.2 and, therefore, denies the same;

5.1.3 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.1.3 and, therefore, denies the same;

5.1.4 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.1.4 and, therefore, denies the same;

5.1.5 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.1.5 and, therefore, denies the same;

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5.1.6 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.1.6 and, therefore, denies the same;

5.1.7 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.1.7 and, therefore, denies the same;

5.1.8 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.1.8 and, therefore, denies the same;

5.1.9 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.1.9 and, therefore, denies the same;

5.1.10 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.1.10 and, therefore, denies the same;

5.1.11 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.1.11 and, therefore, denies the same;

5.1.12 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.1.12 and, therefore, denies the same;

5.1.13 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.1.13 and, therefore, denies the same;

5.1.14 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.1.14 and, therefore, denies the same;

5.1.15 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.1.15 and, therefore, denies the same;

COUNT 2: VIOLATION OF THE FAIR HOUSING ACT § 3617

(Against All Defendants)

5.2.1 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.2.1 and, therefore, denies the same;

5.2.2 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.2.2 and, therefore, denies the same;

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5.2.3 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.2.3 and, therefore, denies the same;

5.2.4 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.2.4 and, therefore, denies the same;

5.2.5 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.2.5 and, therefore, denies the same;

5.2.6 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.2.6 and, therefore, denies the same;

5.2.7 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.2.7 and, therefore, denies the same;

5.2.8 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.2.8 and, therefore, denies the same;

5.2.9 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.2.9 and, therefore, denies the same;

5.2.10 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.2.10 and, therefore, denies the same;

COUNT 3: VIOLATION OF CIVIL RIGHT ACT § 1981

(Against All Defendants)

5.3.1 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.3.1 and, therefore, denies the same;

5.3.2 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.3.2 and, therefore, denies the same;

5.3.3 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.3.3 and, therefore, denies the same;

5.3.4 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.3.4 and, therefore, denies the same;

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5.3.5 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.3.5 and, therefore, denies the same;

5.3.6 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.3.6 and, therefore, denies the same;

5.3.7 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.3.7 and, therefore, denies the same;

5.3.8 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.3.8 and, therefore, denies the same;

5.3.9 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.3.9 and, therefore, denies the same;

5.3.10 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.3.10 and, therefore, denies the same, and requests Defendant's damages and further relief in an amount as the court deems just and proper;

COUNT 4: VIOLATION OF CIVIL RIGHT ACT § 1982

(Against All Defendants)

5.4.1 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.4.1 and, therefore, denies the same;

5.4.2 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.4.2 and, therefore, denies the same;

5.4.3 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.4.3 and, therefore, denies the same;

5.4.4 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.4.4 and, therefore, denies the same;

5.4.5 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.4.5 and, therefore, denies the same;

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5.4.6 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.4.6 and, therefore, denies the same;

5.4.7 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.4.7 and, therefore, denies the same;

5.4.8 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.4.8 and, therefore, denies the same, and requests Defendant's damages and further relief in an amount as the court deems just and proper;

COUNT 5: VIOLATION OF CIVIL RIGHT ACT § 2000a

(Against All Defendants)

5.5.1 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.5.1 and, therefore, denies the same;

5.5.2 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.5.2 and, therefore, denies the same;

5.5.3 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.5.3 and, therefore, denies the same, and requests Defendant's damages and further relief in an amount as the court deems just and proper;

COUNT 6: 42 U.S.C. § 1985, FOURTEENTH AMENDMENT,

DENIAL OF EQUAL PROTECTION

(Against All Defendants)

5.6.1 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.6.1 and, therefore, denies the same;

5.6.2 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.6.2 and, therefore, denies the same;

5.6.3 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.6.3 and, therefore, denies the same;

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5.6.4 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.6.4 and, therefore, denies the same;

5.6.5 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.6.5 and, therefore, denies the same;

5.6.6 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.6.6 and, therefore, denies the same;

5.6.7 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.6.7 and, therefore, denies the same;

5.6.8 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.6.8 and, therefore, denies the same, and requests Defendant's damages and further relief in an amount as the court deems just and proper;

COUNT 7: UNLAWFUL ENTRY, TRESSPASS, INVASION OF PRIVACY

UNLAWFUL SEARCH AND SEIZURE, AND CONVERSION

(Against All Defendants)

5.7.1 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.7.1 and, therefore, denies the same;

5.7.2 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.7.2 and, therefore, denies the same;

5.7.3 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.7.3 and, therefore, denies the same;

5.7.4 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.7.4 and, therefore, denies the same;

5.7.5 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.7.5 and, therefore, denies the same;

5.7.6 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.7.6 and, therefore, denies the same;

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5.7.7 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.7.7 and, therefore, denies the same;

5.7.8 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.7.8 and, therefore, denies the same;

5.7.9 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.7.9 and, therefore, denies the same, and requests Defendant's damages and further relief in an amount as the court deems just and proper;

COUNT 8: VIOLATIONS OF VIRGIN ISLANDS,

PRIVATE NUISANCE LAWS

(Against All Defendants)

5.8.1 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.8.1 and, therefore, denies the same;

5.8.2 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.8.2 and, therefore, denies the same;

5.8.3 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.8.3 and, therefore, denies the same;

5.8.4 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.8.4 and, therefore, denies the same;

5.8.5 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.8.5 and, therefore, denies the same;

5.8.6 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.8.6 and, therefore, denies the same;

5.8.7 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.8.7 and, therefore, denies the same;

5.8.8 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.8.8 and, therefore, denies the same;

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5.8.9 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.8.9 and, therefore, denies the same;

COUNT 9: NEGLIGENCE/GROSS NEGLIGENCE

(Against All Defendants)

5.9.1 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.9.1 and, therefore, denies the same;

5.9.2 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.9.2 and, therefore, denies the same;

5.9.3 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.9.3 and, therefore, denies the same;

5.9.4 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.9.4 and, therefore, denies the same;

5.9.5 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.9.5 and, therefore, denies the same;

5.9.6 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.9.6 and, therefore, denies the same;

5.9.7 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.9.7 and, therefore, denies the same, and requests Defendant's damages and further relief in an amount as the court deems just and proper;

COUNT 10: CIVIL/CRIMINAL CONSPIRACY

(Against All Defendants)

5.10.1 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.10.1 and, therefore, denies the same;

5.10.2 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.10.2 and, therefore, denies the same;

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5.10.3 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.10.3 and, therefore, denies the same;

5.10.4 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.10.4 and, therefore, denies the same, and requests Defendant's damages and further relief in an amount as the court deems just and proper;

COUNT 11: INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

(Against All Defendants)

5.11.1 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.11.1 and, therefore, denies the same;

5.11.2 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.11.2 and, therefore, denies the same;

5.11.3 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.11.3 and, therefore, denies the same;

5.11.4 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.11.4 and, therefore, denies the same;

5.11.5 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.11.5 and, therefore, denies the same;

5.11.6 Defendant lacks sufficient knowledge or information to admit or deny the allegations set forth in ¶ 5.10.6 and, therefore, denies the same, and requests Defendant's damages and further relief in an amount as the court deems just and proper;

AFFIRMATIVE DEFENSES

1. That the Complaint filed has insufficient process;
2. That there is insufficient service of process;
3. That the Honorable Court lacks personal jurisdiction;
4. That the Honorable Court lacks subject matter jurisdiction;

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- 5 That the Complaint is without merit and fails to state a cause of action for which relief can be granted;
6. That the Complaint fails to name all relevant parties;
7. That the Plaintiff should be estopped from proceeding with one, some or all claims;
8. That the Plaintiff has waived his claim of nuisance having knowingly come to the nuisance, if a nuisance at all;
9. That Plaintiff has assumed the risk of alleged negligence;

WHEREFORE Defendant Claudia A. Woldow respectfully moves this Honorable Court as follows:

- a. To deny Plaintiff claim for injunctive and declaratory relief and dismiss the Complaint.
- b. To award Defendant Woldow costs and attorney's fees;
- c. To require Plaintiff to immediately divulge to the Honorable Court location and source of income and property that may be available to pay costs and fees in the event of the dismissal of the Complaint and given Plaintiff's allegations that he is unemployed, his tenancy is ending, and the mere conclusory incoherent nature of Plaintiff's allegations;
- d. To require Plaintiff to immediately divulge to the Honorable Court how Plaintiff came to know Defendant Claudia A. Woldow's name and that she is a resident of this District;
- e. To award Defendant Woldow such other and further relief as to this Honorable Court is reasonable, just and equitable.

Date: June 13, 2018



Claudia A. Woldow

Pro Se, Defendant

P.O. Box 9601

St. Thomas, VI 00801

Tel.: (215) 534-1793

mcwoldow@live.com

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 13th of June, 2018 the undersigned Defendant served a true copy of the foregoing Answer on the following person by first class mail delivery, return receipt requested:

Wilnick Dorval

6700 Sapphire Village

Apt. 265

St. Thomas, VI 00802



Claudia A. Woldow